

May 14, 2008

To: Air Pollution Control Board
Virginia Department of Environmental Quality

From: The Clinch Coalition
Wise County, VA

Re: Virginia City Hybrid Energy Center

The Clinch Coalition is a local environmental group that has been in existence since 1998. We are currently 5,000 members strong. Our mission is to “protect the forest, wildlife, and watersheds of the Clinch Ranger District of the Jefferson National Forest and surrounding areas.” Among the campaigns that we are involved in are our forest watch programs, hemlock woolly adelgid campaign, and various community outreach programs designed to educate the local citizenry regarding the biodiversity of our region. More detailed information about our organization can be found on the internet at: <http://www.clinchcoalition.net/>

Dominion Virginia Power’s plans to build a coal-fired power plant in St. Paul raises concerns for the Clinch Coalition with regards to the potential negative impacts from the resulting pollution to surrounding forests and watersheds. Dominion has ensured us that they are using state-of-the-art technology to control pollution from the proposed power plant, but regardless of how well these controls capture pollution, there is a reasonable probability that some heavy metals and other containments are likely to be introduced into the surrounding area. The following outlines our major concerns:

Mercury dispersal. The Clinch Coalition is interested in preserving our region’s local hunting and fishing traditions by protecting fish and wildlife from mercury contamination. In the Virginia Mercury Study, this statement is made about mercury in the environment, “...(there is) limited scientific understanding of the environmental fate and transport of this element.”¹ Currently, there are several local streams, such as the Guest River, a tributary of the Clinch River, that have mercury advisories against eating fish.

The Clinch River is 2.6 stream miles from the proposed power plant. The Clinch River has unique environmental and ecological values that should be preserved and protected, including scenic, recreational, educational, scientific, and public health values. The Clinch Coalition believes that the close proximity of the proposed Virginia City power plant and Appalachian Electric Power’s Clinch River Power Station could potentially pose a threat to the health of the Clinch River, and should be subjected to more detailed risk assessment studies. The existing AEP power station, which violates federal ambient air quality standards for several pollutants and is located a few miles upstream from Virginia City, has severely damaged the Clinch River through two toxic spills, one of alkaline fly ash slurry in 1967 and one of sulphuric acid in 1970.² The combination of

these two spills affected the Clinch River for 90 miles, all the way downstream into Tennessee, killing over 200,000 fish.³

Before issuance of an air pollution permit, the Clinch Coalition would like to see local mercury deposition studies be required as part of the application process, which would include the identification of any local “hotspots” which could potentially affect the Clinch River and surrounding areas. Further, the Clinch Coalition feels the cumulative effects of the combined air pollution from the Virginia City Hybrid Energy Center and the Clinch River Power Station should be analysed more closely with regards to potential future biocumulation.

Air Quality. Dominion representative James Beazley has stated that approximately 600 coal trucks will be needed daily to bring fuel into the Virginia City power plant. The Clinch Coalition would like to know if the emissions from diesel trucking to and from the plant factored into the total emissions estimates. Also, we are concerned with how the ground-level ozone concentration will increase if this power plant is constructed, and what potential impacts this could pose to surrounding areas. Presently, it is our understanding that the closest EPA ambient air monitor station is in Roanoke. It is our contention that air monitoring should be conducted in areas of Wise County to determine whether the air quality in our area is in compliance with the new ozone standards, or whether we qualify as a non-attainment area?

Dominion is proposing to build a solid waste landfill adjacent to the Virginia City Hybrid Energy Center that will encompass 180 acres of land. The Clinch Coalition is concerned about how much wildlife habitat and diversity will be lost as a result of construction of the waste management facility. The land chosen as the location of the power plant and landfill has been extensively deep mined. The Dominion permit application describes the land as “...subject to subsidence from surface and underground mining.”⁴ The St. Paul and surrounding area is underlain with limestone and is typified by sinkholes, underground drainage, aquifers, and caverns. The Clinch Coalition believes the environmental conditions of the proposed disposal site should be analysed in more detail to ensure the suitability of the location, and to protect the quality of the ground water and watersheds from potential contamination.

In summary, our local forests provide habitat for wildlife, remove excess carbon dioxide from the air, support diverse recreational activities and represent our area’s natural living heritage. The Clinch Coalition would like to see every possible technology employed to reduce pollution from the proposed Virginia City Hybrid Energy Center, in order to protect the health of the public and the integrity of the local environment. To this end, we would like to thank the air pollution control board for assuming control over the permitting process, and feel confident that the board will do everything possible to protect the air and water of southwest Virginia.

Diana Within, President
The Clinch Coalition

Attachments: 1/Clinch Coalition Resolution

CITATIONS

¹“Virginia Mercury Study.” Available at <http://deq.state.va.us/air/vamercury/vamercurystudy.html>

² Butler, R.S., and R.G. Biggins. 2003. Agency Draft Recovery Plan for Cumberland Elftoe (*Alasmidonta atropurpurea*), Oyster Mussel (*Epioblasma capsaeformis*), Cumberland Combshell (*Epioblasma brevidens*), Purple Bean (*Villosa perpurpurea*), and Rough Rabbitsfoot (*Quadrula cylindrica strigillata*). U.S. Fish and Wildlife Service, Southeast Region, Asheville Field Office, Asheville, NC.

³ Kilgore, F., and S. Fowler. 2006. The Clinch River: A World Class Treasure. Mountain Heritage, Inc., St. Paul, VA.

⁴ Landfill application available at <http://www.vchecjpa.info>

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AS, the Clinch Coalition's mission is to protect the forest, wildlife, and watersheds of the Clinch Ranger District of the Jefferson National Forest and surrounding areas

AS, the Clinch Coalition believes that air quality is fundamentally important to the preservation of natural and cultural resources and values

AS, impairment of the forest's air quality, visibility, stream-water chemistry, soils, native fish and vegetation can result from high levels of carbon dioxide, sulfur dioxide, particulate matter, and mercury¹ and the U.S. EPA has identified fossil-fuel burning energy-generating facilities as one of the single greatest major source of these pollutants in the United States²

AS, ozone impairment degrades distance color, contrast, and landscape details, and causes foliar injury that affects the aesthetics of various plant species³

AS, acid deposition adversely impacts plants, streams, and wildlife, and builds on the effects of other stressors such as drought, disease, and insect damage causing direct and indirect damage to forest vegetation in the Jefferson National Forest and surrounding areas⁴

AS, mercury is a powerful neurotoxin that poses serious threats to human health and the environment, and is a global problem that knows no boundaries⁵, and has already been proven to impact aquatic life in certain local streams and watersheds⁶

AS, atmospheric concentrations of carbon dioxide and other greenhouse gases contribute to global warming which potentially threaten human populations and the world's ecosystems⁷

AS, if built, the Virginia City Hybrid Energy Center will emit 5.6 millions tons/year of carbon dioxide 34.09 tons/year of sulfur dioxide 1,020 tons/year of particulate matter 48-72 pounds/year of mercury and 1,968 tons/year of nitrogen oxides⁸

AS, the proposed power plant must fully comply with all requirements of the Clean Air Act and Virginia Air Pollution Control Law, and must therefore comply with all National Ambient Air Quality Standards, by utilizing all available technologies to minimize potentially adverse environmental impacts

AS, if built, the Virginia City power plant will be among the top ten point-sources of air pollution in Virginia, and thus could pose both health and environmental threats to Wise County, and the Commonwealth of Virginia⁹

IT SO T AT, the Clinch Coalition is joining many other organizations and municipalities across the state of Virginia in requesting that Dominion Virginia Power be denied any permits to build this plant¹⁰

IT T SO T AT, the Clinch Coalition calls on the Governor of the Commonwealth of Virginia to seek immediate action on alternatives to the Virginia City Hybrid Energy Center power plant as part of his duty to bring energy security to the Commonwealth.

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¹ U.S. National Park Service, "Air Quality in the National Parks, Second Edition." September 2002. Available at <http://www2.nature.nps.gov/air/AQBasics/ecologic.cfm>

² Dirty Air, Dirty Power Clean Air Task Force, 2004.

³ U.S. Environmental Protection Agency, "How Air Pollution Affects the View," April 2006. Available at http://www.epa.gov/visibility/pdfs/haze_brochure_20060426.pdf

⁴ Galloway, J.N. 2001. Acidification of the World: Natural and Anthropogenic: Water, Air, and Soil Pollution 130:17-24.

⁵ Clean Air Task Force, "Death, Disease and Dirty Power: Mortality and Health Disease Due to Air Pollution from Power Plants." October 2000. Available at <http://www.cleartheair.org/fact/mortality/mortalitylowres.pdf>

⁶ U.S. Environmental Protection Agency, Office of Water, "2004 National Listing of Fish Advisories," September 2005. EPA-823-F-05-004.

⁷ Intergovernmental Panel on Climate Change, "Climate Change 2001: Synthesis Report, Summary for Policymakers." 2001.

⁸ All DEQ permit figures taken from draft air permit, available upon request. Total emissions levels include all sources, including boilers, auxiliary boilers, emergency boilers, and other sources of emissions.

⁹ Downwind from Dominion. February 2008.

¹⁰ Sierra Club-Cool Cities. Available at http://coolcities.us/state.php?state_VA